

BARRIS FARMS

2830 House Ave.
Durham, CA 95938

Mr. Lester Snow - Executive Director

Att. Mr. Rick Breitenbach:
c/o CalFed Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Mr. Snow:

These are our comments on the Draft Programmatic Environmental Impact Statement / Environmental Impact Report on the CALFED Bay-Delta Program, June 1999. Please enter these comments into the formal record of this proposed action.

The one issue we feel strongest about is the lack of adequate protections and monitoring for terrestrial habitat in the Water Transfer Program. Blue Oak and Valley Oak woodlands live and thrive on a healthy groundwater level. These oaks consume their water through taproots. One of the reasons oaks are disappearing from the California landscape is that groundwater levels in many parts of the state are out of their reach.

In Butte County, in the Butte Basin we have over 20 State and Federal Listed and Endangered Species that live in our oak woodlands. CalFed must think of the Valley Oak as a **Keystone Species**, an indicator species to aid in the protection of the other species that depend on them.

Out of basin transfers and water marketing are ideas that predate ecological thinking. Making water into a commodity and privatizing public trust resources only benefit buyer and sellers to the deficit of communities and the environment the water comes from.

Local control is not the answer, either. WE see water marketing companies buying farms in the valley now. Landowners making decisions is not a guarantee of resource protection to the rest of the community.

Third party impacts are not addressed adequately in the Water Transfer Program. Having the ability to go to court is not a protection. For years now no protection has been built into the program because buyers and sellers don't want to consider externalities. Buyer, sellers, their lobbyist and their attorneys are the only people seeking to transfer water. These people are not representative of the rest of the state.

Marketing benefits developers, be it agricultural expansion or housing sprawl. It all is to the detriment of the rest of the state. Water transfers and water marketing facilitate the very things that are ruining our state, over development.

Sincerely,

Tim & Lynn Barris